

<<ENFORCEMENT CONFIDENTIAL>>

I. FACILITY DESCRIPTION (cont.)

Brief Description of Facility Operations and Hazardous Waste Management:

Began operation in 1960. Now processes about 50,000 bbls. of crude per day in the manufacture of fuels, acid, oils and asphalt.

Has a NPDES permit to discharge ~~to~~ treated oily and acid wastes. Has submitted Part A and Part B material for land treatment unit, induced air flotation pond, and flare oily basin

General Description of Solid Waste Management Units (SWMUs), if known (indicate RCRA-regulated units with asterisk):

37 SWMUs identified in the RFA. Three SWMUs are regulated. 1) Land Treatment Unit; 2) IAF Pond; 3) Flare Oily Basin. The remainder of the SWMUs include landfills, waste piles, sewer systems, ponds and various basins.

II. ENVIRONMENTAL SIGNIFICANCE (based on review of PA and discussions with FIT contractor)

A. Preliminary HRS Range (obtain from FIT; indicate if unknown):

*Not scored*

Discussion of ~~FIT~~<sup>ctr.</sup> Recommendations:

*Recommended air, soil, soil gas and groundwater sampling at ~ 25 of the 37 SWMUs*

B. Hazardous Waste Exposure Information

Instructions: Check all applicable. Circle letter indicating evidence of release as appropriate: D - documented evidence (e.g. analytical data), V - visual evidence (e.g. observed spills, stained soils, etc.), P - potential for release (e.g. past waste management practices suggest probable releases, known soil contamination has probably caused groundwater contamination. etc.). Specify documentation, who saw visual evidence, and/or rationale for potential release, if known.

\_\_\_\_\_ Imminent danger to public health/environment. Immediate action required; explain:

Release to soil.    D     V    P

*API    Visual Evidence of release to soil --  
Separator: (unspecified evidence)*

*North Surge Pond: Stained soils*

II. ENVIRONMENTAL SIGNIFICANCE (cont.)

B. Hazardous Waste Exposure Information (cont.)

(Req unit)

Land Treatment Unit:

Release to groundwater. (D) V P

Analysis in Part B showed presence of arsenic and lead in downgradient wells; upgradient well did not.

Release to surface water. D (V) (P)

Storm Water Drainage Swale + Oil Recovery Box:

Discolored soil seen in swale through which stormwater runs to ocean (note: partial source for soil contamination is Brewer Chemical, located adjacent to Chevron)

Release to air. D V (P)

Potential for air releases identical for numerous SWMUs because of volatile constituents in floating material in ponds, tanks, etc.  
 High Potential for Migration (media:)

Release → surface H<sub>2</sub>O → ocean

Sensitive environmental receptors (endangered species, estuaries, etc.) Explain:

near coastal H<sub>2</sub>O.

No releases

II. ENVIRONMENTAL SIGNIFICANCE (cont.)

Extent of Site Characterization (check one):

x moderate minimal \_\_\_\_\_ extensive \_\_\_\_\_ unknown

Exposure Considerations:

possible long term\* Drinking water source at risk: surface or GW  
Depth to GW 4' GW flow direction: W/variable  
GW flow gradient (if known) Not avail.  
Direction/Distance to nearby wells Not avail.  
\_\_\_\_ Fishing, recreation water source at risk  
\_\_\_\_ Irrigation, livestock water source at risk  
\_\_\_\_ Blowing dust; \_\_\_\_\_ Poor Site Security;  
nearby population nearby population  
\_\_\_\_ Target Population < 4 miles (#, if known )  
Exposure pathway(s) \_\_\_\_\_

C. Constituent Release Information

Released Hazardous Constituents of Concern and concentrations(see 40 CFR Section 261 Appendix VIII and Section 264 Appendix IX):

Pb, As (concentrations not available)

Released Hazardous Wastes of Concern (listed/characteristic):

~~Pb, As~~ Not known

Volume of Waste Released (if known):

Not Appl.

Toxicity of Waste (if available from HRS package):

~~Not Appl.~~ lead 18 (water) 3 (air)  
arsenic 8 (water) 3 (air)

\* Information received subsequent to 1986 RFA includes fact that karst topography might effect GW flow direction away from ocean toward area where GW is drinking water + future community expansion is planned.

II. ENVIRONMENTAL SIGNIFICANCE (cont.)

Additional considerations related to environmental significance:

III. SITE ENVIRONMENTAL PRIORITY

Instructions: Assign priority based on technical considerations only. Final priority should be briefly explained in terms of potential exposure to human health and the environment based on the technical considerations in Section II.

\_\_\_\_\_ High Priority

\* Known or suspected release which has resulted in, or which has high potential for, exposure to human population and/or sensitive environments, in the short term ( < 10 years).

\* Rough Guideline: Preliminary worst case HRS score > 25

X  
\_\_\_\_\_ Medium Priority

\* Known or Suspected release with potential for exposure to human health or sensitive environments in the long term ( > 10 years).

\* Rough Guideline: Preliminary worst case HRS score between 16 and 25

Justification: known release of As + Pb to groundwater; however, med. potential for exposure to human health or sensitive environments

\_\_\_\_\_ Low Priority

\* Known or suspected release, but unlikely adverse effect on human health or the environment.

\* Rough Guideline: Preliminary worst case HRS Score between 5 and 15

\_\_\_\_\_ No Further Action

\* No evidence of a release that could adversely affect human health or the environment.

III. SITE ENVIRONMENTAL PRIORITY (cont.)

Comments/Rationale:

IV. RCRA PERMITTING STATUS

A. Contact Person(s):

	Name	Date Contacted	Phone	Agency
1.	Tim Stott - USEPA	Daily	744 2028	EPA-Permits
2.	Lily Herskovits - HI Dept. of Health	Weekly	(808) 543 8235	State-Permits
3.				RWQCB (CA only)
4.				Other (specify)
5.				

B. Current Status (mark all applicable):

Instructions: For source, indicate file document or numeral for contact person listed above.

Operating RCRA TSDF; Source: Tim Stott

Not Operating RCRA TSDF; Source:

Bankrupt Facility; Source:

Non-Notifying TSDF - should be a RCRA TSDF but didn't submit a Part A permit application  
Source:

Generator only - never operated as a TSDF  
Source:

IV. RCRA PERMITTING STATUS (cont.)

B. Current Status (cont.)

X Permitted TSDF or Seeking Permit;  
 Source: Date Permitted: 9/88 Agency: US EPA  
 Part B Permit Application Submitted?  Y  N  
 Permit Application Review Lead (circle)  
 EPA  STATE  OTHER (specify)  
 Corrective Action in (draft) Permit?  Y  N  
 Expected Permit Issuance Date:  
 Permit Expiration Date: 1998  
 Permit Renewal Application Submitted  Y  N  
 (Expected) Renewed Permit Issuance Date:  
 Renewed Permit Expiration Date:

\* Closed or Closing <sup>Unit</sup> ~~Facility~~; Source:  
 Closure Plan Submittal (Expected) Date:  
 Closure Plan Review Lead (circle all applicable):  
 EPA  STATE  OTHER (specify)  
 Closure Plan Approved?  Y  N Date:  
 Closure Certification Received?  Y  N  
 Clean Closed?  Y  N  
 Closure Certification accepted by EPA/DoHS?  Y  N

*See comment  
 under "other"*

       Post-Closure permit; Source:  
 Post-Closure Permit Application Submitted?  
 Y  N  
 Post-Closure Permit Application Review Lead  
 EPA  STATE  Other (specify)

IV. RCRA PERMITTING STATUS (cont.)

B. Current Status (cont.)

Corrective Action in (draft) Permit Y N NA

(Expected) Post-Closure Permit Issuance Date:

\_\_\_\_\_ Combination: some units closing, some seeking permit (i.e. partial closure). Source:  
Explain:

\_\_\_\_\_ Part A Withdrawal Candidate; Source:  
Explain:

\_\_\_\_\_ RWQCB Waste Discharge Requirements requiring investigation and/or remediation in Effect (CA only)

Other Comments:

Closure Plan for Flare Oily Basin (1 SWMU) submitted after permit was issued in '88. Closure certification submitted in May '91 -- presently under review by Tim Slott, USEPA.

This unit received KOSI wastes and was apparently identified after permit issuance as managing hazardous waste.

V. OTHER REGULATORY ACTIVITIES RELEVANT TO CORRECTIVE ACTION

A. Contact Person(s):

	Name	Date Contacted	Phone	Agency
6.	Tim Stott	8/29/91	X 202Y	EPA-Enforcement (RCRA)
7.				EPA-CERCLA
8.				State-Enforcement
9.				State-Superfund
10.				RWQCB
11.				Other (specify)
12.				

B. Activity

Instructions: mark all applicable; note any pertinent outstanding violations.

EPA Enforcement Action with Activities Relevant to Corrective Action; Source:

Date:

Explain:

Warning letter sent to Chevron in 7/91 documenting deficiencies in Land Treatment Demonstration as part of the operating permit.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
 REGION IX  
 215 Fremont Street  
 San Francisco, CA 94105

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**MEMORANDUM**

DATE: 3/20/91 : ~~8/20/86~~ <sup>3/20/91 originally prepared</sup> <sub>RFA</sub> updated

SUBJECT: ~~Preliminary Assessment Review~~  
 Facility Chevron Hawaiian Refinery ~~PA~~ <sub>RFA</sub> date 12/19/86

FROM: Matt Hagemann

TO: Karen Schwinn  
 Chief, Waste Compliance Branch

THROUGH: Nancy Lindsay, Chief, Corrective Action Section *[Signature]*  
 Jim Breitlow, Chief, Permits Section  
 Larry Bowerman, Chief, Alternative Technology Section

**I. FACILITY DESCRIPTION**

Facility Name: Chevron USA Inc. Hawaiian Refinery

Address: P.O. Box 29789  
Honolulu, HI 96820

EPA ID Number: HIT 160010005

DoHS Region (if CA):

RWQCB Region (if CA):

V. OTHER REGULATORY ACTIVITIES RELEVANT TO CORRECTIVE ACTION (cont.)

\_\_\_\_\_ State Enforcement Action with Activities Relevant  
to Corrective Action; Source:  
Date:  
Explain:

\_\_\_\_\_ Regional Water Board Order or WDR Requiring  
Corrective Action (CA only); Source:  
Date:  
Explain:

\_\_\_\_\_ Other Agency Enforcement Action with Activities  
Relevant to Corrective Action; Source:  
Date:  
Explain:

VI. OVERALL STATE LEVEL OF INVOLVEMENT IN CORRECTIVE ACTION  
(based on state actions, level of state staff person's oversight)

Mark one:

\_\_\_\_\_ High        X   Medium      \_\_\_\_\_ Low

Rationale:

State reviewed RFI workplan and made comments

VII. FACILITY WILLINGNESS/ABILITY TO PERFORM CORRECTIVE ACTION

  X   Facility is cooperative

\_\_\_\_\_ Facility is uncooperative; Explain:

\_\_\_\_\_ Unknown

\_\_\_\_\_ Facility may be financially unable to complete work.  
Explain:

Other Comments:

VIII. RECOMMENDATION FOR FURTHER ACTION (mark all applicable)  
Instructions: Consider factors in Sections I - VII to arrive at final recommendation for further action.

\_\_\_\_\_ Imminent and substantial danger to human health or the environment requires issuance of RCRA 7003 Order and/or CERCLA 106 Order.

\_\_\_\_\_ Issue RCRA 3013 order. Release of hazardous waste presents a substantial hazard to human health or the environment (investigation only).

\_\_\_\_\_ Refer to CERCLA for further follow-up.

\_\_\_\_\_ Facility unwilling or unable to perform corrective action (explain in Section VII)

\_\_\_\_\_ Other (e.g. mining waste, active superfund site, generator only, etc.)  
Specify:

X \_\_\_\_\_ No further CERCLA action

\_\_\_\_\_ Conduct an RFA

\_\_\_\_\_ as prelude to expected corrective action order

\_\_\_\_\_ as prelude to permit issuance

\_\_\_\_\_ Use a 3007 letter to obtain more information regarding the following items (a subsequent recommendation must be made after the information is received):

- \_\_\_\_\_ Negotiate 3008(h) Consent Order
- Must have documented or probable release of hazardous wastes or constituents
  - Must be a RCRA TSDf that has interim status (i.e. not yet permitted, including illegal TSDf that should have had interim status.
  - For California, must not have a permit issued by DoHS between 1/13/83 and 11/8/84. Permits issued by DoHS between 11/9/84 and 1/31/86 are considered partial RCRA-equivalent permits; with respect to corrective action, facilities permitted between 11/9/84 and 1/31/86 have interim status.

VIII. RECOMMENDATION FOR FURTHER ACTION (cont.)  
(mark all applicable)

- Incorporate corrective action into post-closure permit through 3004(u) and (v).
- Action  Incorporate corrective action into permit through 3004(u) and (v). (Already permitted 2/88)
- Include corrective action in closure plan (appropriate only for surface soil releases near regulated units)
- Ongoing or planned State action is sufficient to address release(s). Defer to state or other agency lead (identify):
  
- No further RCRA action at present; re-evaluate next year.
- No further RCRA action.
- Other (specify):

Approve RFI wkplan :  
anticipated date Oct. 1991 .  
(Contact: Tim Stott -- lead)

Comments:

Comments:

       Recommendation Accepted

       *Karen Schwinn 10/29/91*  
Karen Schwinn  
Chief  
Waste Compliance Branch

Environmental Benefits:

Raise priority to \_\_\_\_\_ due to near coastal waters impacts.

Raise priority to \_\_\_\_\_ due to estuary project impacts.

When applicable, entity to perform RFA:

\_\_\_\_\_ State

\_\_\_\_\_ FIT (CERCLA)

\_\_\_\_\_ contractor (RCRA)

\_\_\_\_\_ Other; specify:

cc: Rachel Loftin, EPI CERCLA Coordinator, H-8-1  
Jesse Baskir, EPI RCRA Coordinator, H-4-4  
Chief, Permits, H-3-2 (for memos completed by H-3-2 only)  
Chief, Alternative Technology, H-3-3 (for memos completed by  
H-3-2 only)  
Stan Brown, H-2-3 (only where permit status changes are  
recommended, e.g. protective filers)